10. Who will make the determination on what to add to remove the contaminants during the pugmill process? Will the material be analyzed after going through the process to make sure it's clean? Are all of the contaminants found in the soil samples able to be decontaminated through the DMRF? What is the alternate plan for the material that is unsuitable for reuse (the material that is not successfully decontaminated)? Please provide an estimate of the amount of material that will be unsuitable for reuse.

Response:

AES will make the determination on what to add to the dredged material during the processing operation. That determination will be made based upon the composition of the dredged sediments and the intended re-use application of the material. The matrix contained in Attachment 9 provides a listing of the various processes to be followed. It is important to note that the proposed dredged material recycling process does not "remove" contaminants from the dredged material. The process is a solidification/stabilization process which renders a normally high moisture/low strength material into a compactable fill material having optimal moisture content. However, the process will eliminate the leachability of contaminants that may be present in the raw dredged material. Once processed, the material will be stored until it is shipped to its end destination.

Testing of the PDM can be conducted prior to shipment to the proposed beneficial use/upland disposal site(s) if required by the end use. Both acceptance and, if necessary, testing criteria will be determined by the regulatory agency governing the proposed beneficial use/upland disposal rather than the process that is the subject of this application. The matrix in Attachment 9 provides a framework for use in determining what levels of contamination are acceptable for the various proposed end uses.

By following the framework identified in the matrix, it is expected that all material will be suitable for reuse after processing; however, in the event that chemical testing that may be required prior to the end use application reveals the dredge material is unsuitable for beneficial use due to contaminant levels, AES or the third party seeking to use the PDM will properly characterize the dredge material and determine its disposition in accordance with the regulations of the State of Maryland (COMAR 26.13). Depending on the type and level of contamination, the sediment may be used as daily cover at a landfill, incinerated, or treated. The proper method of treating the waste material will be determined in consultation with MDE.

Local RCRA Treatment Storage and Disposal Facilities/Transfer Stations

Clean Harbors, Inc.

Baltimore Facility 1910 Russell Street Baltimore, MD 21230 410.244.8200

The Veolia Environmental Services (VES) York, Pennsylvania

105 Willow Springs Circle

City: York State: PA ZIP: 17402

Phone: (717) 764-8677

For Non-Hazardous Dredged Material:

Mountain View Reclamation 9446 Letzburg Road Greencastle, PA 17225 (800) 634-4595

Pine Grove Landfill 193 Schultz Road Pine Grove, PA 17963 (800) 634-4595

Mountainview Landfill 13300 New Georges Creek Road SW Frostburg, MD 21532 (301) 463-3373

For Oversize/Debris:

Pappy's Landfill 1020 Oak Avenue Joppa, MD 21085 (410) 679-8075